

M^IR MICHELMAN & ROBINSON, LLP
ATTORNEYS AT LAW

Christopher A. D'Angelo
cdangelo@mrlip.com

New York Office
800 Third Avenue, 24th Floor
New York, NY 10022
P 212.730.7700 F 212.730.7725 www.mrlip.com

June 4, 2018

Via ECF

The Honorable James Orenstein
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Re: Soriero v. Battery Park City Authority, 18-CV-01334 (WFK)(JO)

Your Honor:

This firm represents Defendant in the referenced matter. Pursuant to Rule II.A. of Your Honor's Individual Rules, this letter is written to request an adjournment of the initial discovery planning conference scheduled for June 27, 2018, at 10 a.m.

The reason for this request is that the undersigned, lead counsel for Defendant, will be travelling outside of New York City during the week of June 25, and therefore unavailable for the conference. The undersigned is the only attorney in this firm thoroughly familiar with the facts of this case, and the only attorney able to appear. The other attorney who has appeared on behalf of Defendant is out on leave, and does not have sufficient familiarity with the facts of this case to appear for the conference.

Plaintiff's counsel has consented to the request for an adjournment. This request is the first request for an adjournment of this conference. An adjournment of this conference would also impact the June 25 date set forth in Your Honor's May 18 Order, for submission of the Joint Discovery Plan. We respectfully request that this date also be adjourned, to require filing of the Joint Discovery Plan to be two days prior to the conference.

The attorneys have conferred with respect to an alternate date, and we wish to advise the Court that we are not available to appear for this conference on July 11, 12, 13, 16, or 27, due to prior commitments. All other dates in July are currently available.

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Thank you for your attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Chris D'Angelo", written over the typed name.

Christopher A. D'Angelo

cc: Thomas M. Lancia, Esq. (Counsel for Plaintiff)